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IN REPLY TO LTR NO 6534-RF-92



## EG&G ROCKY FLATS

EG&G ROCKY FLATS, INC ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

February 6, 1992

92-RF-1365

Robert M Nelson, Jr Manager DOE, RFO

Attn F R Lockhart

ENVIRONMENTAL EVALUATIONS WITHIN THE PRODUCTION AREAS OF THE ROCKY FLATS PLANT - JEE-0111-92

Ref (a) D P Simonson ltr (0985) to M C Hestmark and G W Baughman, January 28, 1992

(b) D P Simonson Itr (0992) to J M Kersh, Environmental Evaluations Conducted at Operable Units in the RFP Plant Site Areas, January 28, 1992

Several Operable Units (OUs) at the Rocky Flats Plant (RFP) are located at least partly within the Production Area (OUs 4, 8, 9, 10, 12, 13, 14, 15, and 16) Most of these areas are paved and any vegetation present is either landscaping plants or weeds. The Environmental Evaluations (EEs) for these areas are inappropriate

EG&G proposes to delete EEs in the production areas and to treat the entire area as a "Source Term" for contaminants entering adjacent OUs "Source Term" is ecologically defined as a fact that needs no further examination. This adjustment should not require extensive revision to any work already in progress since we are using an ecosystem approach for the other OUs. This approach could increase the number of substances to be assessed as potential contaminants of concern. There may be a need to include additional contaminants for which a transport pathway out of the production area is available. The sampling and analysis burdens on the adjacent OUs may increase, but the biotic assessments will not be affected.

Field sampling plans for OUs that receive the outputs from the production area must reflect the source-receptor model. OUs adjacent to the production area are required to coordinate EE work with any other OUs that could have influence in its purview. This change to delete EEs from the production area OUs should not significantly increase the scope of the work already underway.

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DOE technical staff have indicated their preference for this position. EG&G technical staff believe this effort can be accomplished in a responsible and comprehensive manner. EG&G is currently preparing a Draft Approach to accommodate the proposed changes for OU 9 and OU 10 as a test case for discussion at the next Risk Assessment Technical Working Group meeting on February 21, 1992.

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J.E. Evered, Director Environmental Management EG&G Rocky Flats, Inc.

LEW:dmf

Orig. and 1 cc - R. M. Nelson, Jr.

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R. J. Schassburger - DOE, RFO

B. K. Thatcher